

EXHIBIT 72

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1 UNITED STATES DISTRICT COURT
 2 NORTHERN DISTRICT OF ILLINOIS
 3 EASTERN DIVISION

4 DOROTHY FORTH, DONNA BAILEY,)
 LISA BULLARD, RICARDO GONZALES,)
 5 CYNTHIA RUSSO, TROY TERMINE,)
 INTERNATIONAL BROTHERHOOD OF)
 6 ELECTRICAL WORKERS LOCAL 38)
 HEALTH AND WELFARE FUND,)
 7 INTERNATIONAL UNION OF)
 OPERATING ENGINEERS LOCAL 295-)
 8 295C WELFARE FUND, AND)
 STEAMFITTERS FUND LOCAL 439, on)
 9 Behalf of Themselves and All)
 Similarly Situated,)
 10)
 Plaintiffs,)
 11) Civil No.
 vs.) 17-CV-2246
 12)
 WALGREEN CO.,)
 13)
 Defendant.)

14
 15
 16 ** C O N F I D E N T I A L **
 17

18 The video deposition of MICHAEL AMIET, taken
 19 before Richard Derrick Ehrlich, Registered Merit
 20 Reporter, Certified Realtime Reporter, taken
 21 pursuant to the Federal Rules of Civil Procedure, at
 22 Reed Smith, LLP, 10 S. Wacker Drive, Chicago,
 23 Illinois, commencing at 9:00 a.m., on the 20th day
 24 of November, 2019.
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A P P E A R A N C E S

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1 they have the LED scroll, we would advertise the
2 PSC.

3 And then one of the most powerful marketing
4 tools that we have is our pharmacists and our
5 pharmacy techs who would talk to people about
6 the availability of the program.

7 I think those are the principal ways that
8 we communicated with individuals.

9 Q Who was the target audience or demographic with
10 respect to the marketing program for PSC 1?

11 MS. COLEMAN: Objection to form.

12 THE WITNESS: Everyone, frankly. The
13 marketing wasn't targeted to a particular subset
14 of individuals. Everyone who was paying a
15 significant out-of-pocket amount for drugs who
16 might be interested in being part of a club
17 where they could receive discounts on the amount
18 that they were paying, that's who we were
19 targeting, whoever they might be.

20 BY MR. GUGLIELMO:

21 Q And was part of the message in the marketing
22 that the PSC was an alternative for cash paying
23 customers or retail price paying customers?

24 A The messaging, to my knowledge, is always around
25 uninsured customers, and cash customers are a

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1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED]

7 Q [REDACTED] [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 A [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 MS. COLEMAN: We'll reserve our questions
2 for trial.

3 MR. LEIB: We reserve signature, obviously.

4 MS. COLEMAN: Yes, of course.

5 MR. GUGLIELMO: Okay.

6 VIDEOGRAPHER: This concludes today's
7 testimony by Michael Amiet at 6:16 p.m.

8 Six media sets were used and will be
9 retained by Veritext.

10 (Signature reserved.)

11 (Video deposition concluded.)

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CERTIFICATE

I, Richard D. Ehrlich, a Certified Shorthand Reporter of the State of Illinois, CSR License No. 084-4018, do hereby certify that I stenographically reported the proceedings had at the video deposition, as aforesaid, and that the foregoing transcript is a true and accurate record of the proceedings had therein.

IN WITNESS WHEREOF, I do set my hand at Chicago, Illinois, this 13th day of December, 2019.



Richard D. Ehrlich
Certified Shorthand Reporter
License No. 084.4018